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*Attorneys for Non-Party Bank Leumi USA*

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

INTERNATIONAL INVESTMENT  
GROUP, LLP,

Defendant.

)  
) Case No.: 19-cv-10796-DLC

)  
) Hon. Denise L. Cote, U.S.D.J.

)  
) **NOTICE OF NON-PARTY BANK**  
) **LEUMI USA'S MOTION FOR**  
) **PARTIAL RELIEF FROM THE**  
) **JUDGMENT AND**  
) **PRELIMINARY ASSET FREEZE**  
) **ORDER**  
)

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**TO: All Counsel of Record**

**PLEASE TAKE NOTICE** that, on March 20, 2020 at 10:00 a.m., or as soon thereafter as the Court may permit, Non-Party Bank Leumi USA (“Bank Leumi”), by and through its attorneys, Sherman Wells Sylvester & Stamelman LLP, shall move before the Honorable Denise L. Cote, U.S.D.J., at the Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Courtroom 18B, New York, New York, for an Order granting partial relief from the Judgment and Preliminary Asset Freeze Order as to Defendant International Investment Group LLC (Dkt. No. 9) (the “Freeze Order”), and authorizing the use of frozen account assets at Bank Leumi to satisfy and repay an outstanding loan in the principal amount of \$200,000.00, plus interest and attorneys’ fees, that is due and owing to Bank Leumi from IIG Trade Finance, LLC, an affiliate of Defendant International Investment Group LLC.

**PLEASE TAKE FURTHER NOTICE** that in support of said motion, Bank Leumi will rely upon the Memorandum of Law and Declaration of Douglas J. Meyer submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested pursuant to Rule 3(F) of the Individual Practices of the Hon. Denise L. Cote, U.S.D.J.

DATED: February 27, 2020

SHERMAN WELLS SYLVESTER &  
STAMELMAN LLP

By: /s/ Jordan D. Weinreich

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**CERTIFICATION OF SERVICE**

I hereby certify that on this date, a copy of the Notice of Motion and supporting papers were served by ECF on all counsel of record.

DATED: February 27, 2020

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STAMELMAN LLP

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